



{In Archive} Re: comments on Port Lavaca WER 
Diane Evans to: Michael Pfeil

01/26/2012 03:59 PM

From: Diane Evans/R6/USEPA/US
To: "Michael Pfeil" <Michael.Pfeil@tceq.texas.gov>,
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Hi Mike

Oops - now that I read the IPs more carefully, I see what you mean in your second paragraph below. I used the term partition coefficient incorrectly (I was thinking of the whole equation for dissolved/total ratio, rather than the "Kp" item which goes into the bigger equation). I don't know of any adjustments to the partitioning coefficient (Kp) either.

I was thinking of Figure 1 in the 1994 WER guidance. Please see adobe page 44 of 182 at: http://water.epa.gov/scitech/swguidance/standards/upload/2002_06_11_standards_handbook_handbook_appxL.pdf
(you can ignore the boxes with "Recalculation" procedure)

I thought what happens in the IP procedures for dissolved metals is what is represented in the box for dissolved WERs reading "Net % contribution from the total recoverable metal..." This step is not included in the top part of Figure 1 for Total WERs

I don't have a TexTox in front of me - might have to get one from our permits people to discuss more.

I'm out of the office on Friday, back on Monday - here for another hour though today.

Diane

"Michael Pfeil"	3) Pending any corrections needed to address c...	01/26/2012 01:42:36 PM
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From: "Michael Pfeil" <Michael.Pfeil@tceq.texas.gov>
To: Diane Evans/R6/USEPA/US@EPA
Date: 01/26/2012 01:42 PM
Subject: Re: comments on Port **Lavaca** WER

3) Pending any corrections needed to address comment 2, use of the total WER rather than the dissolved WER is acceptable. Will the TCEQ evaluate both WERs in the reasonable potential calculations, since use of the total WER eliminates use of the partitioning coefficient for marine copper in Table 6 of the IPs? (I'm not sure what typical values for partitioning coefficients are or if it would make a difference).

Diane-

Since the Tex Tox spread sheet has a WER default value of 1, the permit writer simply substitutes the 1 with whatever total WER value we recommend they use.

It's amounts to taking whatever the limit is in the permit and multiplying it by the total WER value. As far as I know no adjustment is ever done to the partitioning coefficient. I think the partitioning coefficient is turns the limit into a dissolved value instead of a total value, since the criterion is for the dissolved portion.

Mike